

UNITED STATES DISTRICT COURT
for the
District of Minnesota

UNITED STATES OF AMERICA

V₁

ROBERT PEREZ,
a/k/a, Roberto Peres

Case No. 18-MJ-313 FLW

CRIMINAL COMPLAINT

I, Timothy A. Inglett, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about April 9, 2018, in Steele County, in the State and District of Minnesota, the defendant did knowingly and intentionally possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a controlled substance, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A).

I further state that I am a Task Force Officer with the Drug Enforcement Administration and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No

Yes No

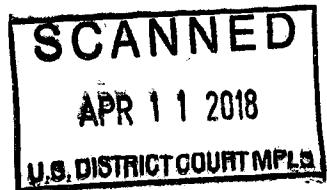
Sworn to before me and signed in my presence.

Date:

4/11/18

City and State: Minneapolis, MN

Printed name and title
Franklin L. Noel
Judge's Signature
Hon. Franklin L. Noel
U.S. Magistrate Judge
Printed Name and Title



18-MJ-313 FLN

STATE OF MINNESOTA)
COUNTY OF HENNEPIN)
) ss. AFFIDAVIT OF TIMOTHY A. INGLETT

Timothy A. Inglett, being duly sworn, deposes and states as follows:

1. I am a Task Force Officer with the Drug Enforcement Administration (DEA) in Minneapolis, Minnesota, where I have been employed since 2015. I have been in law enforcement since 2008, employed by the Hennepin County Sheriff's Office and, in that capacity, I have participated in numerous investigations related to the distribution of controlled substances.

2. I am an investigator or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code; that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 21, United States Code.

3. This Affidavit is submitted in support of a criminal complaint against ROBERT PEREZ, a/k/a Roberto Peres, charging him with possession with intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(A). The facts set forth herein are based on my own personal observations, my review of police reports, and conversations I have had with other law enforcement personnel. The facts set forth herein do not include the complete facts related to this investigation, just those facts necessary to support probable cause for the issuance of a criminal complaint.

4. In March, 2018, the Hennepin County Sheriff's Office - Violent Offender Task Force (VOTF) was conducting an investigation of ROBERT PEREZ, a/k/a Roberto Peres, involved the distribution of methamphetamine in Minnesota and elsewhere.

5. During the course of this investigation, VOTF officers received information from multiple sources of information that PEREZ was involved in multi-state methamphetamine trafficking. The VOTF officers learned that PEREZ had a narcotics source located in Iowa and travels to Iowa to bring methamphetamine to the Twin Cities area for distribution. The sources of information further advised the VOTF officers that PEREZ does most of his dealings during nighttime hours and is driven around by other people including his girlfriend, Amanda Rose Duran.

6. On March 6, 2018, the VOTF officers obtained a state search warrant to track PEREZ's cellular telephone. On April 8, 2018, based on information obtained from the phone tracker warrant, the VOTF officers learned that PEREZ made a trip to Davenport, Iowa in the early morning hours. The VOTF officers subsequently learned that PEREZ was travelling in a 2000 Lincoln Town car, bearing MN license plates AWC-152, with his girlfriend possibly as the driver. On April 9, 2018, the VOTF officers learned that PEREZ was travelling back to the Twin Cities area.

7. On April 9, 2018, the VOTF officers set up surveillance and located the 2000 Lincoln Town car near the intersection of Interstate Highway 35 and Interstate Highway 90 in Steele County, MN. The VOTF officers requested assistance from the Minnesota State Patrol to attempt an interdiction stop of PEREZ and this vehicle. Minnesota State Patrol officers located the vehicle traveling northbound on Interstate Highway 35 and

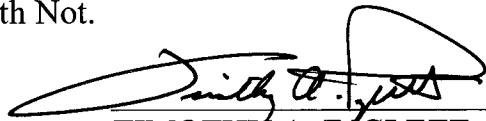
subsequently conducted a traffic stop because the vehicle was travelling in excess of the posted speed limit.

8. Upon approaching the vehicle, Minnesota State Patrol officers observed a male, subsequently identified as PEREZ, in the front passenger seat and a female, subsequently identified as Duran, driving the vehicle. As the officers were speaking to the occupants of the vehicle, they detected the odor of burnt marijuana and observed, in plain view, a quantity of green plant material, believed to be marijuana, on the front center counsel. Officers noted that PEREZ was making furtive movements to his left and reaching into the back seat area where a back pack was located. Officers advised the occupants of the vehicle that they smelled burnt marijuana and observed a quantity of what they believed to be marijuana in the vehicle. As PEREZ was being removed from the vehicle, PEREZ began to run away from the officers. During this flight, PEREZ's jacket was removed from him and fell to the shoulder of the highway. Officers chased PEREZ and subsequently apprehended him in a ditch a short distance away from the vehicle after deploying a Taser on PEREZ.

9. Inside of PEREZ's jacket, the officers recovered approximately two (2) pounds of suspected methamphetamine. The substance recovered from PEREZ's jacket field tested positive for methamphetamine and weighed approximately 997 grams.

10. PEREZ was convicted in 2002 in U.S. District Court, District of Minnesota, for possession with intent to distribute in excess of 50 grams of methamphetamine in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(B).

Further Your Affiant Sayeth Not.



TIMOTHY A. INGLETT, Task Force Officer
Drug Enforcement Administration

SUBSCRIBED and SWORN to Before Me

This day 11th of April, 2018.



Honorable Franklin L. Noel
United States Magistrate Judge